JENNER&BLOCK

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VIA U.S MAIL, EMAIL & FACSIMILE

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Re: Infringement of Full-Length Paramount Films on YouTube

Dear Mark and David,

I am writing concerning the ongoing blatant infringement of Paramount Pictures' full-length feature films on YouTube. On March 13, 2007, Paramount Pictures Corp., together with Viacom International Inc. and their affiliates, brought suit against Google and YouTube for the massive infringement of Paramount's and Viacom's works on YouTube. Notwithstanding the lawsuit, unauthorized Paramount and Viacom works continue to appear on YouTube regularly.

Some of the most egregious infringement is of full-length Paramount feature films. In the last four weeks alone – well after the filing of Paramount's copyright infringement suit against Google and YouTube – we have located more than 60 full-length Paramount films on YouTube. Attached to this letter is a spreadsheet listing these infringing films.

Google and YouTube have asserted that even when they know a work is copyrighted, they have no way of knowing whether copies posted on YouTube are authorized rather than infringing. As you know, we find that assertion implausible – particularly given that we have previously informed you that the thousands of Viacom works for which we have sent takedown notices are merely representative samples and that the postings of Viacom works (including Paramount full-length films) on YouTube are unauthorized. Moreover, no reasonable person, much less the sophisticated business persons who run a corporate giant like Google, could have any reasonable or good-faith doubt about the fact that the posting of full-length feature films produced by major studios such as Paramount is unauthorized and blatantly infringing. To remove any possible doubt Google and YouTube might have respecting Paramount films, we reiterate that Paramount and Viacom have not authorized and will not authorize the posting of any of their full-length feature films on YouTube, and that all such postings are infringing. For Google's and

YouTube's convenience, I append a list of Paramount's top DVD and theatrical releases, which are well-known and easily recognized.

Very truly yours,

Donald B. Verrilli, Jr.

Full-Length Paramount Films on YouTube May 30 to June 25, 2007

DISCOVERY DATE	TITLE	USERNAME	URL
5/30/2006	Perfume	moviesnerds1	http://www.youtube.com/watch?v=R_Tw3yUxHqg
5/21/2007	Dreamgirls	zerruel - private	http://www.youtube.com/watch?v=YtKYf9BkYjs
5/21/2007	Flushed Away	zerruel - private	http://www.youtube.com/watch?v=0mMhLCvn9KI
5/23/2007	Shrek 3	pcb464	http://www.youtube.com/watch?v=rn87-x1Pmxk
5/23/2007	Mission Imposs. 3	appleover12 - private	http://www.youtube.com/watch?v=AoxRJKV16jA
5/23/2007	Barnyard	zerruel - private	http://www.youtube.com/watch?v=Mmwvxjx0bdQ
5/28/2007	Jackass 1	jackassvideos123	http://www.youtube.com/watch?v=Z5MP2S4m2dE
5/28/2007	shrek	XRubberXChickensX	http://www.youtube.com/watch?v=-z8Qf4qa7fA
5/28/2007	shrek 2	lo0ve2	http://www.youtube.com/watch?v=ooppBy57koA
5/28/2007	shrek 3	morningandnight	http://www.youtube.com/watch?v=h3QJJe-ligM
5/28/2007	pet sematary	penelope2000	http://www.youtube.com/watch?v=6WiB3dtEVyE
5/28/2007	Charlottes Web	moviesaregreat1	http://www.youtube.com/watch?v=9jXEr4FmMgw
5/28/2007	Disturbia	moviesaregreat1	http://www.youtube.com/watch?v=5PSOoIiPbPY
5/28/2007	Mean Girls	MovieGirl976	http://www.youtube.com/watch?v=jRj7W0ozCh0
5/29/2007	shrek 3	moviesbymillions	http://www.youtube.com/watch?v=YRibSR28ezI
5/30/2007	Norbit	bigbrotherguy1	
5/31/2007	Norbit	jessica1724	
5/31/2007	Titanic	perels	http://www.youtube.com/watch?v=FBPz-zpOxSI
6/2/2007	Titanic	cad3na	http://www.youtube.com/watch?v=KrcVf8U97tU
6/3/2007	Shrek 3	dvds791m	http://www.youtube.com/watch?v=Ifumy0NUmqA
6/3/2007	South Park	anonymousmothaf00ka	http://www.youtube.com/watch?v=DsRAult6S6U
6/3/2007	Norbit	jessica1724	http://www.youtube.com/watch?v=7IskRsxLJXM
6/4/2007	shrek 3	dvds791m	http://www.youtube.com/watch?v=x-X6_FJwtEE
6/4/2007	longest yard	garmmer	http://www.youtube.com/watch?v=nyyaz0Vza4U
6/4/2007	norbit	garmmer	http://www.youtube.com/watch?v=7UpA4tDcHk8
6/4/2007	Next	americandadguy1	http://www.youtube.com/watch?v=4LgKL4mmUsU
6/4/2007	Shrek 3	ilana4493	http://www.youtube.com/watch?v=aAuRV0mgNf8
6/4/2007	Shrek 3	ropahs	http://www.youtube.com/watch?v=4dzhLqjvlV8
6/4/2007	Road to El Dorado	lidiakitty	http://www.youtube.com/watch?v=Pj24nROFWPU
6/5/2007	titanic	cad3na	http://www.youtube.com/watch?v=CcJQ093-v8w
6/5/2007	Failure to launch	Flor1988	http://www.youtube.com/watch?v=AB4M6BqH3fo
6/6/2007	Shrek 3	totalartist	http://www.youtube.com/watch?v=9w-7sq34o5s
6/6/2007	Shrek 3	dvds791m	http://www.youtube.com/watch?v=21LMr51YXWo
6/6/2007	how to lose a guy in 1	Flor1988	http://www.youtube.com/watch?v=02Zz4TkAPdM
6/7/2007	Next	16140	http://www.youtube.com/watch?v=w62xZ_zpGW4
6/7/2007	Next	snlguy1	http://www.youtube.com/watch?v=nXNI_rN5J9k
6/7/2007	Shrek 3	DonaPiroca	http://www.youtube.com/watch?v=GH5Xs8arU00
6/9/2007	Mean Girls	huldalif	http://www.youtube.com/watch?v=K5SNx8SfZwA
6/9/2007	Lemony Snickets	MiniKiki86	N/A
6/9/2007	titanic		http://www.youtube.com/watch?v=zwTli0f_UOA
6/10/2007	Shrek 3	entourageguy1	http://www.youtube.com/watch?v=ID_YiLtW_IY
6/10/2007	Titanic	hospaperu	http://www.youtube.com/watch?v=T_IFZFoOCmQ
6/10/2007	Shrek 3	filmdvix	http://www.youtube.com/watch?v=86F3B43wm6E
6/10/2007	Shrek 2	jpindahouse	http://www.youtube.com/watch?v=KmZCc5m5UgY
6/12/2007	shrek 3	dvds791m	http://youtube.com/watch?v=Yd3DGhXYCp8
6/13/2007	shrek 3	Kostia91	http://www.youtube.com/watch?v=f9gKMx2iFGo
6/15/2007	shrek 3	AAnwari	http://www.youtube.com/watch?v=aXYMIRAwvrs

6/15/2007	shrek 3	etoilerouge84	http://www.youtube.com/watch?v=stbZcG6M_3w
6/15/2007	Lemony Snickets	Biokatcrawler	http://www.youtube.com/watch?v=AnoZRX0k1bU
6/15/2007	Mean Girls	irina1993	http://www.youtube.com/watch?v=p_YRGQn1Ws8
6/17/2007	Lemony Snickets	qa5zfp6ljh	http://www.youtube.com/watch?v=blSQ2qw4AcY
6/18/2007	titanic	mar1ang3l	http://youtube.com/watch?v=KsTNAGRT-c0
6/18/2007	Norbit	16140	http://www.youtube.com/watch?v=D5lI3Q2QmCE
6/20/2007	Shrek 3	mvtm12	http://www.youtube.com/watch?v=GmqPB7WTOWk
6/20/2007	Lemony Snickets	Kunkuliic	http://www.youtube.com/watch?v=u1dXes1WMyg
6/20/2007	Shooter	oceansth1	http://www.youtube.com/watch?v=vb0SOaxZwmk
6/21/2007	Jackass Number 2	yerpu	http://www.youtube.com/watch?v=Cw_1_ty-3Ok
6/21/2007	Shrek 2	nugsui	http://www.youtube.com/watch?v=pqFHnJfNkUI
6/22/2007	Shrek 2	5865154321	http://www.youtube.com/watch?v=aGa46Gm06qU
6/23/2007	norbit	cre8ives	http://www.youtube.com/watch?v=VAAbw1vLwfM
6/25/2007	Shrek 3	giligen22	

Top Paramount Feature Films

200 CIGARETTES
48 HRS.
A MIGHTY HEART
ABANDON
ACCUSED, THE
ADDAMS FAMILY, THE
AEON FLUX
AGAINST THE ROPES
AIRPLANE!
ALFIE
ALL YOU'VE GOT
ALONG CAME A SPIDER
ANCHORMAN
ANGELA'S ASHES
ANOTHER 48 HRS.
ASK THE DUST
BABEL
BAD NEWS BEARS (2005)
BAD NEWS BEARS, THE
BARNYARD, THE
BASEBALL
BEAVIS AND BUTT-HEAD DO AMERICA
BETTER LUCK TOMORROW
BETTER OFF DEAD
BEVERLY HILLS COP
BEVERLY HILLS COP II
BEVERLY HILLS COP III
BEYOND BORDERS
BIG JAKE
BLACK SHEEP
BLACK SNAKE MOAN
BLADES OF GLORY
BLESS THE CHILD
BLUE HAWAII
BOOMERANG
BRAVEHEART
BREAKDOWN
BREAKFAST AT TIFFANYS
BRINGING OUT THE DEAD
CHANGING LANES
CHARLOTTE'S WEB
CHARLOTTE'S WEB (Live Action)
CHARLOTTE'S WEB 2
CHEECH & CHONG'S STILL SMOKIN'
CHINATOWN
CIVIL WAR, THE
CLEAR AND PRESENT DANGER
CLOCKSTOPPERS
CLUE
CLUELESS
COACH CARTER
COMING TO AMERICA
CONGO
CORE, THE
CROCODILE DUNDEE
CROCODILE DUNDEE IN LOS ANGELES
CROSSROADS
DAYS OF THUNDER
DEEP IMPACT
DICKIE ROBERTS: FORMER CHILD STAR
DISTURBIA
DOMESTIC DISTURBANCE
DONOVAN'S REEF
DOUBLE JEOPARDY
DOWN TO EARTH
DRAGONSLAYER
DREAMGIRLS
DROP ZONE
EL DORADO
ELECTION
ELIZABETHTOWN
ENEMY AT THE GATES
ESCAPE FROM ALCATRAZ
ESCAPE FROM L.A.
EVENT HORIZON
EXTREME OPS
EYE FOR AN EYE
FACE/OFF
FADE TO BLACK
FAILURE TO LAUNCH

Top Paramount Feature Films

FATAL ATTRACTION
FERRIS BUELLER'S DAY OFF
FIGHTING TEMPTATIONS, THE
FIRM, THE
FIRST WIVES CLUB, THE
FLAGS OF OUR FATHERS
FLASHDANCE
FLIGHT OF THE INTRUDER
FLUSHED AWAY
FOOTLOOSE
FORREST GUMP
FOUR BROTHERS
FOUR FEATHERS, THE
FREEDOM WRITERS
FRIDAY THE 13TH
FRIDAY THE 13TH - PART II
FRIDAY THE 13TH - PART III
FRIDAY THE 13TH PART - IV:THE FINAL CHAP
FRIDAY THE 13TH PART V: A NEW BEGINNING
FRIDAY THE 13TH PART VI : JASON LIVES
FRIDAY THE 13TH PART VII:THE NEW BLOOD
FRIDAY THE 13TH, PART VIII - MANHATTAN
FUNNY FACE
GENERAL'S DAUGHTER, THE
GET RICH OR DIE TRYIN'
GHOST
GHOST AND THE DARKNESS, THE
GIFT, THE
GLADIATOR
GODFATHER PART II, THE
GODFATHER PART III, THE
GODFATHER, THE
GOLDEN CHILD, THE
GREASE
GREASE 2
HARD RAIN
HARDBALL
HARLEM NIGHTS
HAROLD AND MAUDE
HATARI
HEY ARNOLD! THE MOVIE
HIGH AND THE MIGHTY, THE
HONDO
HONEYMOONERS, THE
HOURS, THE
HOW TO LOSE A GUY IN 10 DAYS
HUNT FOR RED OCTOBER, THE
HUNTED, THE
HUSTLE & FLOW
I.Q.
IN & OUT
IN HARM'S WAY
INCONVENIENT TRUTH, AN
INDECENT PROPOSAL
INDIANA JONES AND THE LAST CRUSADE
INDIANA JONES AND THE TEMPLE OF DOOM
ISLAND IN THE SKY
ITALIAN JOB (1969)
ITALIAN JOB, THE
JACKASS: THE MOVIE
JACKASS:NUMBER TWO
JIMMY NEUTRON: BOY GENIUS
JUICE
K-19: THE WIDOWMAKER
KING KONG
KISS THE GIRLS
LADIES MAN, THE
LARA CROFT TOMB RAIDER: THE CRADLE OF LI
LARA CROFT: TOMB RAIDER
LARRY THE CABLE GUY: HEALTH INSPECTOR
LAST HOLIDAY
LAST KISS
LEMONY SNICKET'S A SERIES OF UNFORTUNATE
LONGEST YARD, THE
LONGEST YARD, THE (1974)
LOSING ISAIAH
LOVE STORY
LUCKY NUMBERS
MACHINIST, THE
MAD HOT BALLROOM

Top Paramount Feature Films

MADAGASCAR
MAJOR LEAGUE
MAN WHO SHOT LIBERTY VALANCE, THE
MANCHURIAN CANDIDATE
MARCI X
MEAN CREEK
MEAN GIRLS
MI:3
MISSION IMPOSSIBLE
MISSION IMPOSSIBLE II
MOMMIE DEAREST
NACHO LIBRE
NAKED GUN 2 & 1/2 : THE SMELL OF FEAR
NAKED GUN 33 1/3: THE FINAL INSULT
NAKED GUN FROM THE FILES OF POLICE SQUAD
NARC
NECESSARY ROUGHNESS
NEIL YOUNG: HEART OF GOLD
NEXT
NEXT BEST THING, THE
NIGHT AT THE ROXBURY, A
NORBIT
NUTTY PROFESSOR, THE
OFFICER AND A GENTLEMEN, AN
OLD SCHOOL
ONCE UPON A TIME IN THE WEST
ORANGE COUNTY
OUT-OF-TOWNERS, THE
OVER THE HEDGE
PAINT YOUR WAGON
PATRIOT GAMES
PAYBACK
PAYCHECK
PERFECT SCORE, THE
PERFUME: THE STORY OF A MURDERER
PET SEMATARY (OLD)
PLANES, TRAINS AND AUTOMOBILES
POOTIE TANG
PRESIDIO, THE
PRETTY IN PINK
PRIMAL FEAR
PRINCE AND ME, THE
PRIVATE PARTS
RAIDERS OF THE LOST ARK
RAT RACE
REGARDING HENRY
RELIC
RIO LOBO
ROMAN HOLIDAY
ROMEO AND JULIET
ROSEMARY'S BABY
RUGRATS GO WILD
RUGRATS IN PARIS: THE MOVIE
RUGRATS MOVIE, THE
RULES OF ENGAGEMENT
RUNAWAY BRIDE
SABRINA
SABRINA (1959)
SAHARA
SAINT, THE
SATURDAY NIGHT FEVER
SAVE THE LAST DANCE
SCHOOL OF ROCK, THE
SCHOOL TIES
SCORE, THE
SCROOGED
SERPICO
SERVING SARA
SHAFT
SHANE
SHARK TALE
SHE'S THE MAN
SHOGUN
SHOOTER
SHOOTIST, THE
SHREK 2
SHREK THE THIRD
SIMPLE PLAN, A
SKY CAPTAIN AND THE WORLD OF TOMORROW
SLEEPY HOLLOW

Top Paramount Feature Films

SLIDING DOORS
SNAKE EYES
SNOW DAY
SONS OF KATIE ELDER, THE
SOUTH PARK:BIGGER, LONGER & UNCUT
SPONGEBOB SQUAREPANTS MOVIE, THE
STAR TREK GENERATIONS
STAR TREK II: THE WRATH OF KHAN
STAR TREK III: THE SEARCH FOR SPOCK
STAR TREK IV: THE VOYAGE HOME
STAR TREK V: THE FINAL FRONTIER
STAR TREK VI: THE UNDISCOVERED COUNTRY
STAR TREK: FIRST CONTACT
STAR TREK: INSURRECTION
STAR TREK: NEMESIS
STAR TREK: THE MOTION PICTURE
STEPFORD WIVES, THE (2004)
SUM OF ALL FEARS, THE
SUNSET BOULEVARD
SUPERSTAR
SUSPECT ZERO
SWITCHBACK
TALENTED MR. RIPLEY, THE
TEAM AMERICA: WORLD POLICE
TEN COMMANDMENTS, THE
TERMS OF ENDEARMENT
THE RAINMAKER
THREE DAYS OF THE CONDOR
TIMELINE
TITANIC
TO CATCH A THIEF
TOMMY BOY
TOP GUN
TOP SECRET!
TRADING PLACES
TRANSFORMERS
TRUE GRIT
TRUMAN SHOW, THE
TUPAC: RESURRECTION
TWISTED
U-2 RATTLE AND HUM
UNCOMMON VALOR
UNTOUCHABLES, THE
UP IN SMOKE
URBAN COWBOY
VANILLA SKY
VARSITY BLUES
VIRGIN SUICIDES, THE
VIRTUOSITY
WAR OF THE WORLDS
WAR OF THE WORLDS, THE
WARRIORS,THE
WAYNE'S WORLD
WAYNE'S WORLD 2
WE WERE SOLDIERS
WEATHER MAN, THE
WHAT WOMEN WANT
WHAT'S EATING GILBERT GRAPE
WHITE CHRISTMAS
WILD THORNBERRYS MOVIE, THE
WINDS OF WAR
WITHOUT A PADDLE
WITNESS
WONDER BOYS
WOOD, THE
WORLD TRADE CENTER
YEAR OF THE DOG
YOU CAN COUNT ON ME
YOURS, MINE, AND OURS
ZODIAC
ZOOLANDER